

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
DURHAM DIVISION

---

In re:

**Sharon E. Davis**

Soc.Sec.No: xxx-xx-3901

Mailing Address: 164 Evie Lynn RoadPittsboro, NC 27312

Case No. 09-80262- -

Chapter 13

Debtor.

---

**RESPONSE**

Undersigned counsel for the Debtor hereby responds to the Trustee's Motion to Disallow the claim of Suntrust Bank and would request that the matter be set for hearing. In support of this Response, the Debtor would show:

1. Counsel for the Debtor has reviewed the claim of Suntrust and has requested further information from the North Carolina Department of Motor Vehicles regarding the existence of a lien against the Debtor's mobile home.
2. The only registered lienholder is Bank of America/ NationsBank.
3. Counsel for the Debtor will be seeking, by adversary proceeding, a cancellation of the Bank of America/NationsBank lien.. Further, counsel for the Debtor will also seek a determination that the Suntrust claim is void pursuant to 11 U.S.C. 506(d)

Dated: September 6, 2011

**LAW OFFICES OF JOHN T. ORCUTT, P.C.**

/s Koury Hicks

---

Koury Hicks  
N.C. State Bar No.: 36204  
6616-203 Six Forks Road  
Raleigh, NC 27615  
(919) 847-9750

## CERTIFICATE OF SERVICE

I, Renee Nolte, of the Law Offices of John T. Orcutt, P.C., under penalty of perjury, do hereby certify that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on September 6, 2011, I served copies of the foregoing **RESPONSE**, by **US Mail and/ or automatic electronic noticing** upon the following parties:

Richard Hutson II  
Chapter 13 Trustee

Michael D. West  
Bankruptcy Administrator

SunTrust Bank  
Attn: Managing Agent  
PO Box 85160  
Richmond VA 23285-5160

Sharon E. Davis  
PO Box 964  
Chapel Hill, NC  
27514

/s Renee Nolte

---

Renee Nolte